

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
JOANN INC., <i>et al.</i> , ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket Nos. 760, 851, 930 & 1016

**CERTIFICATION OF COUNSEL REGARDING AMENDED FIRST
NOTICE OF ASSUMPTION AND ASSIGNMENT OF CERTAIN
EXECUTORY CONTRACTS AND/OR UNEXPIRED LEASES**

The undersigned counsel to Ann Aber in her capacity as Plan Administrator in the above-captioned cases (the “Plan Administrator”), hereby certifies as follows:

1. On April 28, 2025 the debtors and debtors-in-possession in the above-captioned cases (the “Debtors”) filed the *First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* [Docket No. 760] (the “First Assumption Notice”) regarding the assumption and assignment of the unexpired leases set forth on Schedule 2 to the First Assumption Notice (the “Original Assumption List”).

2. On May 16, 2025, the Debtors filed the *Amended First Notice of Assumption and Assignment of Certain Executory Contracts and/or Unexpired Leases* [Docket No. 930] (the “Amended First Assumption Notice”). Attached as Schedule 2 to the Amended First Assumption Notice was a revised schedule of unexpired leases (the “Revised Assumption List”). Attached as Schedule 3 to the Amended First Assumption Notice was a proposed form of order (the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

“Assumption Order”) authorizing the assumption and assignment of the unexpired leases on the Revised Assumption List.

3. The deadline to object to the Amended First Assumption Notice was May 30, 2025 (the “Objection Deadline”).

4. On May 12, 2025, the landlord of Store No. 2566 (the “Landlord”) filed the *Objection of Myrtle Beach Farms Company, Inc. to First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* [Docket No. 851], and on May 29, 2025, filed the *Objection of Myrtle Beach Farms Company, Inc. to Amended First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* (together, the “Objection”).

5. On July 31, 2025, the Court held a hearing on the Amended First Assumption Notice and the Objection (the “Hearing”). At the Hearing, the Court overruled the Objection.

6. Following the Hearing, Burlington and the Landlord agreed to a revised form of order that accurately describes the Court’s ruling on the record at the Hearing, which is attached as **Exhibit A** (the “Revised Assumption Order”). A blackline comparing the Revised Assumption Order to the Assumption Order is attached hereto as **Exhibit B**.

7. Any unresolved objections and informal comments received regarding the remaining balance of the leases included in the Amended First Assumption Notice (collectively, the “Outstanding Leases”) are not included in the Revised Assumption Order. For the avoidance of doubt, the Amended First Assumption Notice remains pending, and has not been withdrawn, with respect to the Outstanding Leases.

8. Accordingly, the Plan Administrator requests entry of the Revised Proposed Order attached hereto as **Exhibit A** at the Court’s earliest convenience.

Dated: August 7, 2025
Wilmington, Delaware

/s/ Jack M. Dougherty

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